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Attorneys for the ad hoc group of LBT Noteholders (the “LBT Ad Hoc Group”)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re) Chapter 11
)
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,) Case No. 08-13555 (JMP)
) Jointly Administered
)
Debtors.)
) Hon. James M. Peck
)

NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS

1. PLEASE TAKE NOTICE that the law firm of Brown Rudnick LLP hereby appears on behalf of the LBT Ad Hoc Group. The members of the LBT Ad Hoc Group, whose names and addresses are set forth in Schedule A, attached hereto, or their managed fund entities, are beneficial holders of, or the holders or managers of various accounts with investment authority, contractual authority or voting authority over, notes (the “LBT Notes” and holders thereof, the “LBT Noteholders”) issued by Lehman Brothers Treasury Co. B.V. (“LBT”), a non-Debtor, and guaranteed by Debtor Lehman Brothers Holdings, Inc. (“LBHI”). The members of the LBT Ad Hoc Group or their managed fund entities are collectively the beneficial holders of

The members of the LBT Ad Hoc Group or their managed fund entities collectively are the beneficial holders of approximately \$1.7 billion in face amount of LBT Notes, and have corresponding claims against LBHI arising from LBHI's guarantee of the LBT Notes.¹

Pursuant to section 1109(b) of title 11 of the United States Code (as amended, the "Bankruptcy Code") and Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), Brown Rudnick LLP requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon it at the following offices, postal addresses and e-mail addresses:

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request applies to and includes not only the notices and papers referenced in the Bankruptcy Rule and Bankruptcy Code, but also includes, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, courier services, hand delivers, facsimile transmission, electronic mail, telex or otherwise that (i) affects, or seeks to affect, or may potentially affect in any way, any rights or interests of any creditor or party-in-interest in these chapter 11 cases, including the LBT Ad Hoc Group; (ii) affects, or seeks to affect (a) the above-

¹ Although members of the LBT Ad Hoc Group or their managed fund entities may hold other claims against LBHI or its affiliates, Brown Rudnick represents such members only in their capacity as members of the LBT Ad Hoc Group unless otherwise indicated.

captioned Debtors and/or their estates or (b) property or proceeds thereof in the possession, custody, or control of others that any of the Debtors or their estates may seek to use; or (3) requires or seeks to require any act, delivery of any property, payment or other conduct by the LBT Ad Hoc Group.

PLEASE TAKE FURTHER NOTICE that the LBT Ad Hoc Group does not, by filing this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance constitutes a waiver of any of its respective rights: (i) to have final orders in noncore matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceeding so triable in these cases, or any controversy or proceeding related to these cases; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions setoffs or recoupments to which the LBT Ad Hoc Group is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs or recoupments the LBT Ad Hoc Group expressly reserves.

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Dated: New York, New York
August 19, 2010

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Steven B. Levine_____

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Schedule A - Members of LBT Ad Hoc Group

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Citigroup Global Markets, Inc.

390 Greenwich Street
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Cyrus Capital Partners LP

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39th Floor
New York, NY 10022

Fir Tree Partners LP

505 Fifth Avenue
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New York, NY 10017

Ore Hill Partners LLC

650 Fifth Avenue
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New York, NY 10019

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The Royal Bank of Scotland plc

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TPG Opportunity Fund I, LP

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